

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LAW SCHOOL ADMISSION COUNCIL,
INC.,

Plaintiff,

v.

MORLEY TATRO,
d/b/a CAMBRIDGE LSAT

Defendant.

Civil Action No. 15:5219-MAK

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT'S AMENDED MOTION TO DISMISS**

Plaintiff Law School Admission Council, Inc. ("LSAC") requests that the Court grant LSAC until December 21, 2015 to respond to the Amended Motion to Dismiss (Dkt. No. 21) filed by defendant Morley Tatro d/b/a Cambridge LSAT ("Defendant"), in lieu of requiring LSAC to respond to Defendant's Original Motion to Dismiss (Dkt. No. 9). The reasons for this request are as follows:

1. On October 29, 2015, Defendant filed its Original Motion to Dismiss for lack of personal jurisdiction. *See* Dkt. No. 9.
2. After Defendant failed to comply with the Court's Scheduling Order pertaining to the timing for jurisdictional discovery, the Court granted LSAC an extension to respond to Defendant's Original Motion to Dismiss setting the deadline at December 11, 2015. *See* Dkt. No. 17 ¶ 2.
3. On December 3, 2015, Defendant filed an Amended Motion to Dismiss. *See* Dkt. No. 21. Defendant's Amended Motion to Dismiss raises a variety of new arguments regarding general and specific jurisdiction.

4. In lieu of responding to Defendant's Original Motion to Dismiss, LSAC requests that it be given until December 21, 2015 – the amount of time LSAC would be entitled to under the Local Rules of the Eastern District of Pennsylvania and the Federal Rules of Civil Procedure to respond to a newly filed Motion to Dismiss – to respond to Defendant's Amended Motion to Dismiss.¹

5. Counsel for Defendant has represented that he does not oppose this Motion.

A proposed order is attached.

DATED: December 4, 2015

s/ John V. Gorman
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¹ By filing the instant Motion, LSAC does not waive any arguments and expressly reserves all rights regarding the propriety of Defendant's unilateral filing of the Amended Motion to Dismiss.

CERTIFICATE OF SERVICE

I, John V. Gorman, hereby certify that on December 4, 2015, I caused a copy of the foregoing document to be filed via the Court's CM-ECF system, which will send electronic notice to the following:

Julie D. Lathia, Esquire
The Law Offices of Julie D. Lathia
212 West Gay Street
West Chester, PA 19380

s/ John V. Gorman
John V. Gorman